



**SOUTH COAST AIR QUALITY MANAGEMENT  
DISTRICT**

**ENGINEERING & COMPLIANCE**

**APPLICATION PROCESSING AND CALCULATIONS**

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**P/C to P/O EVALUATION FOR  
NEW RTO & MODIFY FILM CLEANING & FILM PRINTING MACHINES**

**Facility ID:** 009668

**Legal Owner or Operator:** DELUXE LABORATORIES INC.

**Mailing Address:** 1377 N. SERRANO AVE.  
HOLLYWOOD, CA 90027-5623

**Equipment  
Location:** SAME AS ABOVE

**Equipment Description:**

**A/N 481187** P/C to PO

**AIR POLLUTION CONTROL SYSTEM CONSISTING OF:**

1. REGENERATIVE THERMAL OXIDIZER (RTO), ADWEST TECHNOLOGIES, MODEL RETOX2.0 RTO95, WITH ONE 578,000 BTU PER HOUR START-UP BURNER, MAXON KINEMAX 1-1/2 G AND A NATURAL GAS INJECTION SYSTEM.
2. EXHAUST SYSTEM WITH 10 H.P. BLOWER VENTING EIGHT FILM CLEANERS, TWO WET GATE FILM PRINTERS AND ONE SCRAP CABINET.

**A/N 481189** P/C to PO (modification to A/N 459611, PO F84248)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.

**A/N 481190** P/C to PO (modification to A/N 459612, PO F84256)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO

**A/N 481191** P/C to PO (modification to A/N 459613, PO F84257)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.

**A/N 481192** P/C to PO (modification to A/N 459614, PO F84258)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.



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**A/N 481193** P/C to PO (modification to A/N 459615, PO F84261)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.

**A/N 481194** P/C to PO (modification to A/N 459616, PO F84262)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.

**A/N 481195** P/C to PO (modification to A/N 459617, PO F84274)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL, VENTED TO RTO.

**A/N 481196** P/C to PO (modification to A/N 459630, PO F84263)

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

**A/N 481197** P/C to PO (modification to A/N 406439, PO F56679)

WET-GATE FILM PRINTER, OPTICAL TYPE, CUSTOM MADE, 1'-6" W. X 8'-6" L. X 8'-6" H., WITH ONE ELECTRIC AIR HEATER, TWO 1/3 HP EXHAUST BLOWERS, AND ONE 1/3 HP SOLVENT PUMP, VENTED TO RTO.

**A/N 481198** P/C to PO (modification to A/N 406442, PO F56678)

WET-GATE FILM PRINTER, OPTICAL TYPE, CUSTOM MADE, 1'-6" W. X 8'-6" L. X 8'-6" H., WITH ONE ELECTRICAL AIR HEATER, TWO 1/3 HP EXHAUST BLOWERS, AND ONE 1/3 HP SOLVENT PUMP, VENTED TO RTO.

**A/N 516964**

Title V "De Minimis Significant Permit Revision" Plan – 3<sup>rd</sup>. Revision

**HISTORY:**

On 4/8/2008 Deluxe Laboratories submitted twelve (12) applications as Class I for Permits to Construct and Operate the equipment described above. The applicant was exceeding the existing VOC emission limit on the film cleaning and printing machines and was not able to comply with the existing VOC cap indicated below, therefore, the company was under a Stipulated Order for Abatement #5654-1 until April 30, 2009 (document in file).



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The applicant proposed to install a new Regenerative Thermal Oxidizer (RTO). Eight (8) existing film cleaning and two (2) existing wet gate film printing machines that are using VOC containing solvents are vented to the RTO to control and reduce the quantity of VOC emissions to the atmosphere and bring the operations into compliance with the existing equipment/group cap. Since the potential VOC

emissions prior to control were increased more than 1 pound per day from each machine, the equipment was required to meet BACT under this project. The RTO was expected to meet 95% overall VOC control efficiency, therefore, the BACT requirement was met. Permits to Construct were issued on February 3, 2009. The RTO was installed and source tested on Nov. 9, 2009, and was "Conditionally Acceptable" by source testing group on Dec. 23, 2009 (see attachment).

At the time the P/C was issued, we were under a permit moratorium due to the court decision in November 2008 which restricted the AQMD from issuing permits that rely on the Rule 1304 offset exemption (ref. letter to "all persons installing or operating equipment that requires an AQMD permit" and "Permit Moratorium Fact Sheet" both dated January 9, 2009). As it was described in the Fact Sheet, the District could not issue permits for the equipment if the emissions of each criteria pollutant from the permit unit is below the offset requirement (less than 15 lbs/mo). In order to issue the permit to construct, Deluxe Laboratories proposed to keep the NOx emissions from the new RTO to less than 15 lbs/month by limiting the hours of the RTO start-up burner operation to 5.5 hrs/month. They also had a written guarantee from the RTO manufacturer, for a NOx concentration of 1.2 ppmv or less during normal operation (after start-up). The emission calculations and operating limitations were revised and updated to ensure the NOx emissions stay below 0.5 lb/day (15 lb/month, see attachment). Since the Moratorium is no longer applicable, company requested these limitations be removed. The emissions and permit conditions will be updated for permit to operate. Conditions #4, 5 & 6 will be removed, conditions # 7 & 8 will be replaced with CAM conditions. The S/T conditions will also be removed (just leave periodic monitoring – test once every five years during the life of the permit).

**Summary of Applications**

<b>Application #</b>	<b>Equipment Description</b>	<b>Existing A/N, Permit #</b>	<b>Existing Emission Cap,</b>	<b>Proposed Facility Cap for VOC</b>
481187	RTO	New installation	N/A	1944 lb/mo facility VOC cap excluding 7 grandfathered film cleaners
481189	Film Cleaning	459611, F84248	18 gal/month	
481190	Film Cleaning	459612, F84256	18 gal/month	
481191	Film Cleaning	459613, F84257	18 gal/month	
481192	Film Cleaning	459614, F84258	18 gal/month	
481193	Film Cleaning	459615, F84261	18 gal/month	
481194	Film Cleaning	459616, F59616	18 gal/month	
481195	Film Cleaning	459617, F84274	18 gal/month	
481196	Film Cleaning	459630, F84263	18 gal/mo. with A/Ns 406439 & 406442	
481197	Wet-Gate Printing	406439, F56679	18 gal/mo. with A/Ns 406442 & 459630	
481198	Wet-Gate Printing	406442, F56678	18 gal/mo. with A/Ns 406439 & 459630	



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The average & maximum operating schedule for this equipment:

24 hr/day	6 dy/wk	52 wk/yr	(average)
24 hr/day	7 dy/wk	52 wk/yr	(maximum)

This is a Title V facility and the Title V renewal permit was issued to the facility on October 1, 2006. This project is the 3<sup>rd</sup> revision since the issuance of the Title V renewal permit. This administrative permit revision will be included with the de minimis significant permit revision to add an IC Engine and replace a film cleaning machine, and administrative revision to convert a P/C to a P/O for a carbon adsorber (see Reg. XXX evaluation).

The facility has had no citizen complaints filed in the last two years. However, the facility was issued a Notice of Violation on 04/16/2009 requiring the applicant to submit Forms 500-ACC and 500-SAM in timely manner, and NC # D28787 on 04/06/2010 requiring the facility to demonstrate compliance for all the operating boilers between 400,000 BTU/hr up to 2MM BTU/hr per Rule 1146.2. The facility has complied with both notices.

**PROCESS DESCRIPTION:**

Deluxe Laboratories Inc. is in the business of film developing, film coloring and film duplication for the major motion picture industry. This company bids for jobs offered by the motion picture industry. The production rate as well as solvent emissions varies from year to year depending on the size and number of contracts. Therefore, the company does not have a constant pattern of solvent usage and emissions.

Presently, the company uses Perc. in a maximum of ten of their cleaning and printing machines at any one time. The machines are vented to an existing activated carbon adsorber whenever Perc. is used. These film cleaning machines will maintain capability to use perc and vent to the carbon adsorber. The wet gate printers are currently not allowed to use perc and are limited to 1 lb/day VOC. Since this equipment is vented to the RTO, the VOC limit was removed. A facility VOC cap of 1944 lb/month was added based on the previous 18 gal/mo solvent usage limits as summarized in the emission calculations. This cap excludes seven grandfathered film cleaners with no limits.

This new RTO was installed to control VOC emissions from 8 film cleaning and 2 wet-gate film printing machines that are using VOC containing solvents instead of perc. The RTO is equipped with a burner that will be used only for start up to bring the chamber up to 1700 °F. After a 30 minute soak period at 1700 °F the burner shuts off and the gas injection comes on. The gas injection set point is 1500 °F. During normal operation, the burner is automatically shut off, and in addition to process gas, natural gas is injected at the inlet to the fan as necessary to maintain the temperature of the chamber at 1500 °F. According to the burner manufacturer, the gas injection operation is flameless and the NOx emissions low. The source test results showed >98% destruction efficiency.

**RTO DESIGN:**

**Velocity and Retention Time:**

RTO Size	2000 cfm = 7774 acfm @ 1600 °F
Burner Rating	578,000 Btu/hr



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Chamber Dimensions                      42" W. X 20" H. X 114" L.  
Combustion Chamber Velocity        21 ft/sec @ 100 °F

Flow is 2000 scfm or 7774 acfm @ 1600 F.  
The volume of the combustion chamber is 55.4 cubic feet.

Retention time =  $((55.4 \text{ ft}^3)/(7774 \text{ ft}^3/\text{min})) \times (60 \text{ sec}/\text{min}) = 0.43 \text{ seconds}$

The cleaning and printing machines will be vented to the RTO at a maximum flow rate of less than 2000 scfm.

**RTO Size:**

The RTO is sized for 2000 scfm and the flow rate of the cleaning and printing machines vented to the RTO is less than 2000 scfm. Therefore, the RTO is adequately designed.

**RTO Heat Requirement:**

Since the natural gas is injected to maintain the temperature at 1500 °F. the system is adequately designed to meet the heat requirement.

**RTO is adequately designed to function properly for the purpose of controlling VOC emissions at an efficiency of at least 95% by weight as specified by the manufacturer.**

**EMISSION CALCULATIONS:**

The proposed project will increase the VOC emissions from each film cleaning and printing machine more than 1 lb/day based on the current equipment usage caps, therefore, BACT is triggered for each machine. The cleaning and printing machines that use VOC containing solvents at this facility are vented to and controlled by the RTO. The RTO was demonstrated to meet the BACT requirements. RTO is equipped with a burner that is used only during the start up to bring the temperature of the bed up to 1700 °F. During normal operation, the RTO will maintain temperature from the VOC in the process gas, and also is equipped with a natural gas injection system to maintain a temperature of 1500 °F.

**Pre-modification potential to emit VOC Emissions:**

Density of solvent for the following calculations is assumed based on perchloroethylene since the applicant previously used perc. (when perc. was considered VOC) in thi equipment (based on previous evaluation when ODC converted to VOC).

A/N 481189 (A/N 459611) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481190 (A/N 459612) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481191 (A/N 459613) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481192 (A/N 459614) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481193 (A/N 459615) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481194 (A/N 459616) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481195 (A/N 459617) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.



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A/N 481196-98 (A/N 459630, 406439 & 406442) combined 18 gal/month x 13.5 lbs/gal = 243 lbs/mo.

The total VOC emissions allowed –  $8 \times 243 \text{ lb/mo} = 1944 \text{ lb/mo}$ . This limit was added as a facility wide VOC condition to ensure no emission increase as a result of this modification.

The modification has reduced the VOC emissions from the facility to less than 10 tons/yr, and the facility requested exemption from Title V after the RTO is installed. However, based on a recent discussion with EPA, our determination is that Deluxe cannot be exempt from Title V since they are subject to the degreaser NESHAP, and their Perc. emissions were well above 10 tpy after 12/02/1994 promulgation of the NESHAP.

The film cleaning and printing machines are enclosed systems (except for two slots where the film enters and exists) therefore, we assumed that 100% of VOC is captured and vented to the RTO. The RTO will be conditioned to 95% overall VOC control efficiency. The source test data confirms the overall efficiency (98.7%). The emissions from film cleaning & printing are as follows:

VOC for each film cleaning and film printing machine:

$$R1 = 4.4 \text{ lb/hr} \quad R2 = 4.4 \text{ lb/hr} (1-0.95) = 0.22 \text{ lb/hr}$$

Some criteria pollutants will be emitted as a result of the products of combustion from the start-up burner in the RTO.



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#### RTO

Net Emission Increase (A/N 481187)

	<u>maximum</u>	<u>normal</u>		
<u>hr/dy</u>	24	1	<u>max heat input</u>	5.78E+05 (BTU/hr)
<u>dy/wk</u>	7	6	<u>gross heating value</u>	1050 (BTU/scf)
<u>wk/yr</u>	52	52		
<u>load</u>	100%	75%		

  

	<u>Emission</u>	<u>MAX</u>	<u>AVE</u>	<u>MAX</u>	<u>30-DAY</u>	<u>MAX</u>	<u>MAX</u>
	<u>Factors</u>	(lb/hr)	(lb/hr)	(lb/dy)	(lb/dy)	(lb/yr)	(ton/yr)
SO <sub>2</sub> (R1)	0.83	0.000	0.000	0.011	NA	4	0.002
SO <sub>2</sub> (R2)	0.83	0.000	0.000	0.011	0.011	4	0.002
NO <sub>2</sub> (R1)	130	0.072	0.054	1.717	NA	625	0.313
NO <sub>2</sub> (R2)	130	0.072	0.054	1.717	1.717	625	0.313
CO (R1)	35	0.019	0.014	0.462	NA	168	0.084
CO (R2)	35	0.019	0.014	0.462	0.462	168	0.084
N <sub>2</sub> O (R1)	2.2	0.001	0.001	0.029	NA	11	0.005
N <sub>2</sub> O (R2)	2.2	0.001	0.001	0.029	0.029	11	0.005
PM, PM <sub>10</sub> (R1=R2)	7.5	0.004	0.003	0.099	0.099	36	0.018
CO <sub>2</sub> (R1=R2)	1.20E-05	0.000	0.000	0.000	0.000	0	0.000
TOC (R1=R2)	7	0.004	0.003	0.092	0.092	34	0.017
acetaldehyde	0.0043	2.4E-06	1.8E-06	5.7E-05	NA	2.07E-2	1.03E-5
acrolein	0.0027	1.5E-06	1.1E-06	3.6E-05	NA	1.30E-2	6.49E-6
benzene	0.008	4.4E-06	3.3E-06	1.1E-04	NA	3.85E-2	1.92E-5
formaldehyde	0.017	9.4E-06	7.0E-06	2.2E-04	NA	8.18E-2	4.09E-5
napthalene	0.0003	1.7E-07	1.2E-07	4.0E-06	NA	1.44E-3	7.21E-7
PAH's	0.0001	5.5E-08	4.1E-08	1.3E-06	NA	4.81E-4	2.40E-7
toluene	0.0366	2.0E-05	1.5E-05	4.8E-04	NA	1.76E-1	8.80E-5
xylenes	0.0272	1.5E-05	1.1E-05	3.6E-04	NA	1.31E-1	6.54E-5
NO <sub>2</sub> @ 3% excess O <sub>2</sub> ----->>		100.16	(ppmv)	SO <sub>2</sub> @ 3% excess O <sub>2</sub> ----->>		0.46	(ppmv)
CO @ 3% excess O <sub>2</sub> ----->>		44.29	(ppmv)	PM @ 12% CO <sub>2</sub> ----->>		5.5E-09	(grain/ft <sup>3</sup> )

Ver. 1.3

The emissions as a result natural gas combustion during start up for data entry are as follows. The start-up burner will typically run for 60-90 minutes from a cold start to get up to temperature (1500-1700 degrees F).

R1 = R2      NO<sub>x</sub> = 0.072 lb/hr @ 24 hrs/day = 2 lb/day  
R1 = R2      CO = 0.02 lb/hr @ 24 hrs/day = 0.48 lb/day

Based on previous experience and according to the manufacturer, the flameless oxidation creates a negligible quantity of criteria pollutants, with less than 2 ppm NO<sub>x</sub>. During normal operation when venting the film cleaning and printing machines, the combustion emissions are calculated at 2 ppm NO<sub>x</sub> and 2000 scfm exhaust:

$$2 \text{ ppm NO}_x \text{ ft}^3 / \text{ft}^3 \times 2000 \text{ ft}^3 / \text{min} \times 60 \text{ min/hr} \times 46 \text{ lbNO}_2 / \text{mole} \div 1 \text{ mole} / 379 \text{ ft}^3 = 0.029 \text{ lb/hr}$$



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The maximum emissions would be when the RTO starts from a cold start, assume 3 hrs/day, with the remaining 21 hrs/day @ 2 ppm NOx. Normally, starting from a cold start will not occur daily, or even weekly.

$$R2 \text{ max lb/day} = (3 \text{ hr/day} \times 0.072 \text{ lb/hr}) + (21 \text{ hr/day} \times 0.029 \text{ lb/hr}) = 0.825 \text{ lb/day}$$

**AIR TOXIC EVALUATION:**

These applications were filed to install a new RTO to control VOC from film cleaning and printing machines. There will be a negligible increase in toxic emissions due to the combustion of natural gas in the RTO at start-up. Tier II indicates that MICR is below 1 in a million and HIC/HIA are less than 1.

There will be no increase in VOC or toxic emissions from the film cleaning and printing machines since the emission cap will remain the same; the individual solvent usage limits will be converted to a facility VOC emission limit. The cleaning and printing machines will most likely have a decrease in actual emissions.

**RULE EVALUATION:**

Rule 212(c)(1): This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. Since there is no school located within 1,000 ft, a public notice is not required.

Rule 212(c)(2) & (g): These sections require a public notice for all new or modified facilities or sources that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g). The emission increases from the burning of natural gas in the RTO start-up burner and the small amount during normal operation are below the daily maximums, therefore, public notice is not required.

Rule 212(c)(3): Public notice is not required - increase in toxics is negligible. MICR is less than 1 in a million, HIA/HIC less than one.

Rule 401: Compliance is expected. Visible emissions are not expected with the proper operation of the equipment.

Rule 402: Compliance is expected. Nuisance is not expected with the proper operation of the equipment, no complaints on file.

Rule 1147: The facility has installed a low NOx burner, and conducted the source test. The NOx emissions during start up with just the burner was 57.6 ppm @ 3% O<sub>2</sub>, which is below the rule requirement 60 ppm @ 3% O<sub>2</sub> (effective at 15 years old).





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Rule 1303(a): The film cleaning machines and wet gate printers are subject to BACT since there will be an increase in emissions from each permit unit. A source test was conducted to show the RTO is controlling VOC emissions with an overall efficiency of at least 95% and is considered BACT. Compliance is expected.

Rule 1303(b)(1): Modeling is not required for VOC. Emissions from the RTO due to start-up (worst case hour) and normal operation are below the Table A-1 values, therefore modeling is not required.

Lb/hr	NO <sub>x</sub>	CO	PM <sub>10</sub>
Calculated	0.044*	0.0093*	0.004
Rule 1303 Table A-1	0.2	11	1.2

\*The source tested values for NO<sub>x</sub> and CO were below the calculated emissions.

Rule 1303(b)(2): There are no VOC emission increases from the facility. The emissions from the combustion of natural gas in the RTO during start-up and during normal operation are expected to be less than one, except for NO<sub>x</sub>. Offsets are not required for NO<sub>x</sub> since the emissions are exempt under Rule 1304 (c)(4), Regulatory compliance.

Rule 1401: Compliance is expected. The increase in toxic emissions from the combustion of natural gas in the RTO start-up burner is negligible. See screening risk assessment – MICR is below 1 in a million HIC/HIA are less than 1.

Rule 1425: If perc is used this equipment will continue to be vented to the carbon adsorber. Compliance is expected.

**REGULATION XXX:**

This equipment was previously issued Permits to Construct and was included in Section D of the Title V facility permit. Since the installation and modifications are completed, and the equipment has been operating, permits to operate are recommended since the applicant has demonstrated to the District that this equipment operated in compliance with all applicable rules and regulations.

This revision also includes several other changes, as summarized in the following table (these evaluations were done separately). The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:



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**Title V Permit Revisions Summary**

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>
1 <sup>st</sup> Permit Revision, modification of eight film cleaning and two film printing machines by venting them to a new RTO (Application #s 481187, 481189-98), removal of A/N 418285 (F64065), a film cleaning machine.	0	0	1	0	0	0
2 <sup>nd</sup> Permit Revision, change of condition of one activated carbon permit under P/O F84309 by changing the adsorption cycle (A/N 493510)	0	0	0	0	0	0
3 <sup>rd</sup> Permit Revision, De minimis Significant Revision: installation of a functionally identical film cleaning (A/N 511419), install new ICE (A/N 516869), Administrative Revision: P/C to P/O for RTO (A/N 481187), Carbon Adsorber (A/N 493510), 8 film cleaners (A/N 481189-481196) & 2 wet-gate printers (A/N 481197-8)	0	0	11	0	0	3
Cumulative Total	0	0	12	0	0	3
Maximum Daily	30	30	40	30	60	220

Pursuant to Rule 3000(b)(1)(D), the issuance of a final Permit to Operate for equipment previously issued Title V Permits to Construct is considered as an “administrative permit revision”. A final permit to operate for equipment will be used to previously issued Title V permit to construct, with no change in permit terms and conditions except for the removal of permit to construct terms or conditions which are no longer applicable. However, since this revision will be included with the “de minimis significant revision” for the new ICE and replacement of a film cleaning machine, it will be sent to EPA for 45-day reviews before issuance of the revised TV permit. This will also include the administrative revision to convert a P/C to P/O for a carbon adsorber.

**CONCLUSION/RECOMMENDATION:**

The proposed project is expected to comply with all applicable District Rules and Regulations. The proposed project is considered as an administrative revision, however will be included with the “de minimis significant permit revision” to install a new IC engine and replace a film cleaner. It is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility with P/Os for the RTO, 8 film cleaners, and 2 wet gate printers, and replacement film cleaner, and P/C for the IC engine.